

BDM:KKO  
F. #2016R02228

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

Criminal Docket No. 18-633

ALEKSANDR ZHUKOV, *et al.*

Defendants.

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The United States of America, by and through RICHARD P. DONOGHUE, United States Attorney for the Eastern District of New York, and Karin Orenstein, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, 981(a)(1)(C), 982(a)(1), 982(a)(2)(B) and 1030(i)(1); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c). The United States hereby gives notice that, in addition to the forfeiture allegations in the above-captioned Indictment, the United States seeks forfeiture of the following property pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i)(1), as to Counts Eight through Eleven of the Indictment:

Bank Accounts

- (i) any and all funds on deposit in C.I.M. Banque, account number CH8408822106476595000 held in the name of Octmedia LP, and all proceeds traceable thereto;
- (ii) any and all funds on deposit in C.I.M. Banque, account number CH2908822108000000390 held in the name of Intercap, up to and including \$20,000.00, and all proceeds traceable thereto;
- (iii) any and all funds on deposit in C.I.M. Banque, account number CH1208822106451845000 held in the name of Intercap, up to and including \$1,150,000.00, and all proceeds traceable thereto;
- (iv) any and all funds on deposit in Raiffeisen Bank, account number CZ125500000009250253095 held in the name of Impex Alliance, up to and including \$3,163,177.92, and all proceeds traceable thereto;
- (v) any and all funds on deposit in Kazmommertsbank account number KZ109261802156214001 held in the name of Business Way LLP, up to and including \$230,000, and all proceeds traceable thereto
- (vi) any and all funds on deposit in C.I.M. Banque account number CH5708822106476595001 held in the name of Octmedia LP, and all proceeds traceable thereto

Domain Names

- (vii) web-counter.info
- (viii) winsrw.com
- (ix) mssvr2.com
- (x) listx2.com
- (xi) devps.net
- (xii) bestwaytosearch.com
- (xiii) service8.org
- (xiv) k5service.org
- (xv) telegabid.com
- (xvi) adserver4.com
- (xvii) adserver4us.com

- (xviii) cdntitude.com
- (xix) majlishlistlounge.com
- (xx) ads-player.com
- (xxi) syncvantage.com
- (xxii) diffusionads.com
- (xxiii) adcrtb.com
- (xxiv) ads-matic.com
- (xxv) ak-is.net
- (xxvi) mediaqlt.com
- (xxvii) xmlsearchresult.com
- (xxviii) omegabid24.com
- (xxix) rxrtb.bid
- (xxx) xmlfeed.info

as any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses, and such person's interest in any personal property that was used or intended to be used to commit or to facilitate such offenses.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York  
March 15, 2019

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: \_\_\_\_\_ /s/  
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